

From: Michael Beam  
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(804) 527-3424

June 16, 2012

To: Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
701 East Broad Street – Room 4000  
Richmond, Virginia 23219

2012 JUN 22 PM 12:33  
RICHMOND DIVISION

**Response to :**

**“Notice of Liquidating Trust’s Thirty-Fifth Omnibus Objection to Claims: Reduction of certain partially invalid claims, fixing of certain unliquidated claims, or disallowance of certain invalid claims, as applicable (Short Term Incentive Program)”**

**Status Hearing to be held 2:00 p.m. (Eastern Time) on July 10, 2012 – Courtroom 5000**

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a) caption:

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In Re:

Circuit City Stores, Inc., et. al., (Debtors) Chapter 11  
Case No. 08-35653 (KRH)

**Response to :**

**“Notice of Liquidating Trust’s Thirty-Fifth Omnibus Objection to Claims: Reduction of certain partially invalid claims, fixing of certain unliquidated claims, or disallowance of certain invalid claims, as applicable (Short Term Incentive Program) – Claim #6022**

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b) claimant information: (as previously submitted and reviewed in court on March 22, 2011)

Michael W. Beam      Claim # 6022 / 13410

Claim Amount      \$19,186.23 USD

Claim Amount represents my individual half of FY09 STIP bonus. This claim assumes the following:

½ Bonus – Company Performance – Assume 0% payout or 0\$

½ Bonus – Individual performance – Assume 100% payout or \$19, 186.23.

\*Note - The amount of this claim was reviewed and accepted as accurate in court on March 22, 2011.  
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c) concise statement of relevant facts:

- The objection states that Claim # 6022 should be Expunged. In the paperwork sent with this objection, there is no reference as to why this claim is being expunged. In fact, the packet sent with this objection contains objection explanation information for another objection. As stated above, this claim amount was approved by the court on March 22, 2011, it was later re-classified to General Unsecured. I submit the only reason that claim #6022 should be disallowed is if its duplicate claim #13410 is being preserved as a valid claim to be paid. Since the objection paperwork does not state this, and the claims register on the "KCCLLC" website lists both claims as duplicates, I am sending in this response to ensure that my previously accepted STIP claim is preserved to be paid as determined by the court.
- I am unable to attend the status hearing in person on July 10<sup>th</sup>. I would welcome the opportunity to participate in this hearing via teleconference, an option which was offered to me during my last appearance before this court. Please contact me with the necessary information if this is possible. I respectfully submit, based on the facts stated above as well as in previous submissions and testimony, that my bonus be paid in full as ruled by this court.

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d) No additional paperwork is being submitted other than this objection response.

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e) declaration of person with personal knowledge: previously submitted and reviewed in court on March 22, 2011

f) claimant contact information

Michael W. Beam  
5227 Scotsglen Drive  
Glen Allen, VA 23059  
(804) 527-3424

NOTE: Claimant address is the notice address.

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g) representative of claimant

same as claimant above

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Respectfully Submitted,



Michael W. Beam

June 16, 2012

Cc:

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Andrew W. Caine, Esq.

(admitted pro hac vice)

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